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2			
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7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
8	UNITED STATES OF AMERICA,	Case No. 2:22-mj-00468-BNW	
9	Plaintiff,	Stipulation for an Order Directing Probation to Prepare	
10	v.	a Criminal History Report	
11	SANTOS TORRES-NOVERON,		
12	aka "Santos Roman Torres-Noveron," aka "Santos Ramon Torres-Noveron,"		
13	Defendant.		
14			
15	IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.		
16	Frierson, United States Attorney, and Jared L. Grimmer, Assistant United States Attorney,		
17	counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and		
18	Jeremy C. Baron, Assistant Federal Public Defender, counsel for Defendant SANTOS		
19	TORRES-NOVERON, that the Court direct the U.S. Probation Office to prepare a report		
20	detailing the defendant's criminal history.		
21	This stipulation is entered into for the following reasons:		
22	The United States Attorney's Office has developed an early disposition		
23	program for immigration cases, authorized by the Attorney General pursuant to the		
24	PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has		

extended to the defendant a plea offer in which the parties would agree to jointly request ar		
expedited sentencing immediately after the defendant enters a guilty plea.		
2. The U.S. Probation Office ca	annot begin obtaining the defendant's criminal	
history until after the defendant enters his guilty plea unless the Court enters an order		
directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of		
a defendant's initial appearance when charged by indictment.		
3. The U.S. Probation Office informs the government that it would like to begin		
obtaining the criminal history of defendants eligible for the early disposition program as		
soon as possible after their initial appearance so that the Probation Office can complete the		
Presentence Investigation Report by the time of the expected expedited sentencing.		
4. Accordingly, the parties request that the Court enter an order directing the		
U.S. Probation Office to prepare a report detailing the defendant's criminal history.		
DATED this 14th day of June, 2022.		
	Respectfully Submitted,	
RENE L. VALLADARES Federal Public Defender	JASON M. FRIERSON United States Attorney	
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/s/Jeremy C. Baron JEREMY C. BARON	<u>/s/ Jared L. Grimmer</u> JARED L. GRIMMER	
Assistant Federal Public Defender	Assistant United States Attorney	
Counsel for Defendant SANTOS TORRES-NOVERON		
TORKES-IVO VEROIV		

1 **UNITED STATES DISTRICT COURT DISTRICT OF NEVADA** 2 UNITED STATES OF AMERICA, Case No. 2:22-mj-00468-BNW 3 Plaintiff, **Order Directing Probation to** 4 Prepare a Criminal History Report [Proposed] v. 5 SANTOS TORRES-NOVERON, 6 aka "Santos Roman Torres-Noveron," 7 aka "Santos Ramon Torres-Noveron," 8 Defendant. 9 Based on the stipulation of counsel, good cause appearing, and the best interest of 10 11 justice being served: 12 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history. 13 DATED this 16th day of June, 2022. 14 15 16 UNITED STATES MAGISTRATE JUDGE 17 18 19 20 21 22 23 24